

The defendant then made numerous cash withdrawals and internet purchases and negotiated checks from the account without the authorization of the account holder. The government would introduce documentary evidence from the MBNA account as well as testimony from MBNA representatives to support these facts.

As part of the scheme, and in furtherance thereof, the defendant also wired money from the MBNA account to her personal account at Hibernia National Bank. The government would introduce records from MBNA and Hibernia National Bank to show that on or about December 23, 2002, the defendant caused money to be transferred by wire from MBNA in Wilmington, Delaware to Hibernia National Bank in New Orleans, Louisiana.

Finally, Special Agents of the FBI would testify that the defendant was interviewed regarding these facts. During the interview, the defendant confessed to the above.

G. DALL KAMMER
Assistant United States Attorney

Date

VALERIE JUSSELIN
Counsel for Defendant

Date

SAMANTHIA MILLER
Defendant

Date